




## Exhibit B.1

The below identification of how HopDrive's Accused Products meet at least each and every limitation of claims 1, 4, 6-8, and 11-14 of U.S. Patent No. 10,787,133 ("the '133 patent") is exemplary. Throughout the chart, references to HopDrive and Social Auto Transport should be viewed as interchangeable, as the two names refer to the same company and Social Auto Transport is currently doing business as HopDrive.

HopDrive's infringing system is offered through at least: (1) HopDrive's website, for example, through the Move Planner interface in the Dealer Portal, and (2) HopDrive Apps including, for example, the Social Auto Transport app featuring the Driver Portal (collectively "the Accused Products").

U.S. Patent No. 10,787,133	HopDrive's Accused Products
[1(pre)] A method for managing drivers of vehicles, comprising:	<div><p>HopDrive's system employs a method for managing drivers of vehicles.</p><div><div><h3>Accept a Move</h3><p>Get notified, in real-time, when a vehicle near you needs to be moved. Receive the full details of the move, addresses included. You can make an informed decision to accept or decline without ramifications. Simply mark yourself as started to begin.</p></div><div><h3>Deliver the Vehicle</h3><p>Drive someone else's car for a change. Move the customer's car to the requested location. Upon pickup and delivery you will preform a pre and post-trip inspection, capture vehicle information, snap photos, and upload the information to our app.</p></div><div><h3>Catch a Ride</h3><p>Catch a ride back to your car, ON US! If we don't have a return trip planned for you to drive to another location, then the HopDrive app will automatically request a ride back for you. By the way, you get paid for the ride back as well! Earn money while you drive AND ride!</p></div></div><p><a href="https://hopdrive.com/driver-overview">https://hopdrive.com/driver-overview</a></p></div>



## Schedule a HopDrive

Schedule a move in our easy-to-use Dealer Portal. In most cases, our drivers can be on location within 90 minutes. Customers get a visual of the driver, the vehicle, and the step-by-step tracking in real-time.



## HopDrive Arrives

Upon arrival, the driver inspects the car and takes photos to document its condition, pre-trip. Your dealership and the customer both receive copies of the inspection report, with pictures, in the portal.



## HopDrive Delivers

Upon delivery, the driver inspects the car and takes photos to document its condition, post-trip. We document end mileage, then share information with you and the customer in the portal.

<https://hopdrive.com/dealer-overview>



**hopdrive**

(800) 913-7674 (804) 487-3935

### Move Planner

Welcome to the move planner. This form allows you to set up a plan to move your vehicles. When the pickup time arrives, one of our drivers will be ready to move your vehicle(s) for you. Be sure to have someone meet our driver at both ends for inspection.

**TYPE**

**One-Way**  
Move a single vehicle to a different lot.

**Round-Trip**  
Swap two vehicles between lots.

**Concierge**  
Retrieve your customer's vehicle and return it to the service lot.

**Concierge + Loaner**  
Assign a loaner vehicle to the customer and retrieve their vehicle for service.

**LANE**

Pickup Location  
Search for a location...

Delivery Location  
Search for a location...

SHOW FAVORITE LANES

**MOVE**

Pickup Location  
Search for a location...

The pickup time allows you to set a time when the vehicle should be picked up. Note that the pickup time is not exact and may differ from 5-10 minutes.

Pickup Date  
07/29/2021

Pickup Time  
02:10 PM

Dealer Contact  
Dealer/service contact info

Notes/Instructions (0/255)  
Special instructions...

Reference #

**AUTOMATIC** **MANUAL**

Stock VIN

Make Model

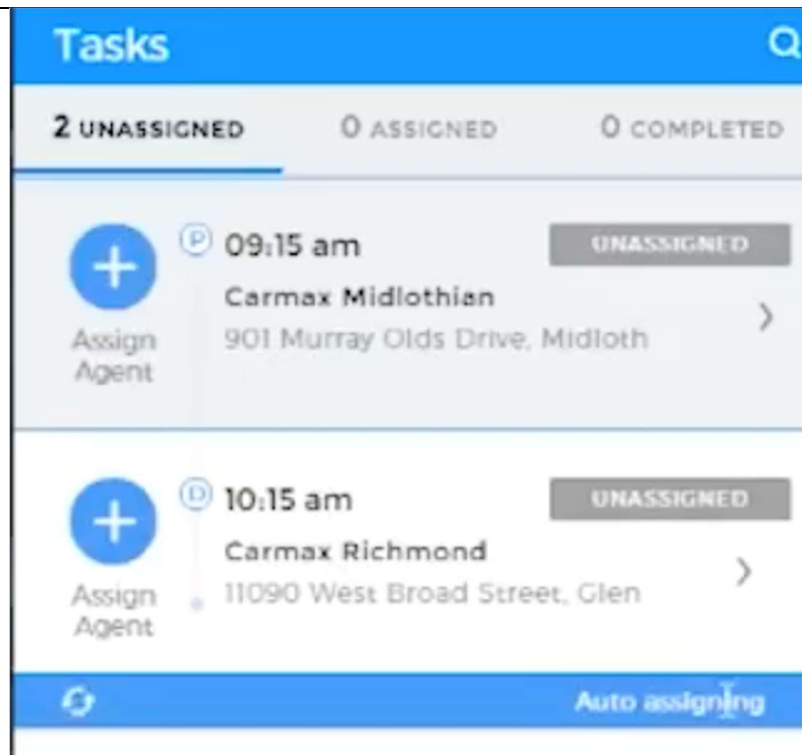
Year Color

FINISH PLAN

<https://marketplace.fortellis.io/solutions/social-auto-transport-inc/hopdrive?id=3eac4c50-06ee-42dc-b995-2c5159f70974>

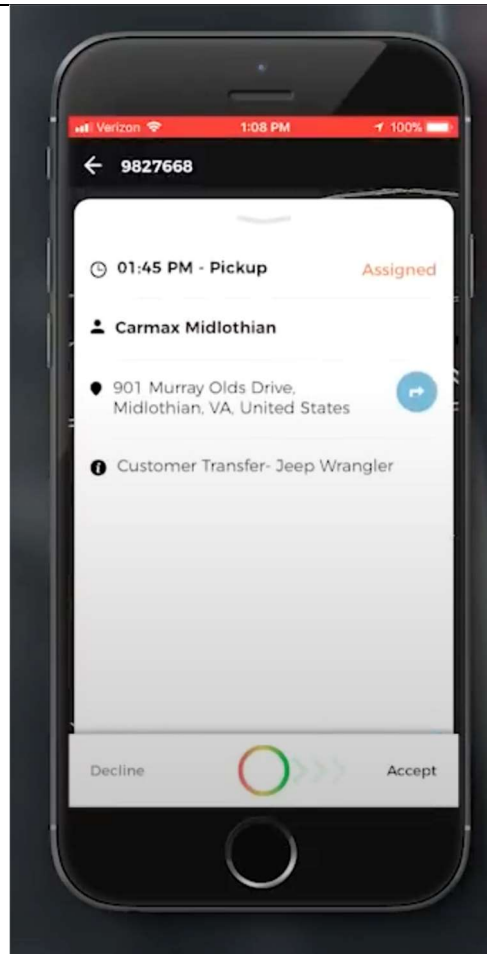
[1(b)] automatically generating a trip request for the trip, said trip request including a driver for the vehicle for the trip;

On information and belief, HopDrive's system automatically generates a trip request for the trip, said trip request including a driver for the vehicle. In HopDrive's system, a trip request is commonly referred to as a "task." The below image shows that HopDrive's system has an "auto assigning" functionality that provides one example of how HopDrive's system will assign drivers to the automatically generated trips. Once the task is assigned to a driver, the assigned driver is notified and can accept or decline the trip.



<https://youtu.be/4KHyavk8Bqs?t=10>

The below screenshot shows an automatically generated trip displayed on the driver's mobile application. The trip is "assigned" and the driver can accept or decline the trip.



<https://youtu.be/4KHyavk8Bqs>

To the extent that HopDrive contends that their method for managing drivers of vehicles featuring “Auto assigning” does not “automatically generat[e] a trip request for the trip, said trip request including a driver for the vehicle for the trip,” upon information and belief, HopDrive’s method using the “Auto assigning” feature satisfies these claim elements under the doctrine of equivalents. The Auto assigning feature shows an automatically generated trip displayed on the driver’s mobile application, where the trip may be accepted or

	<p>declined by the receiving driver. Therefore, HopDrive’s method for managing drivers of vehicles performs substantially the same function, in substantially the same way, to obtain the same result as the “automatically generating a trip request for the trip, said trip request including a driver for the vehicle for the trip” claim limitation of Draiver’s method. Upon information and belief, HopDrive’s method for managing drivers of vehicles is not substantially different from the patent’s disclosed method.</p>
<p>[1(c)] wherein automatically generating the trip request includes determining licensing information specific to the driver for the vehicle for the trip,</p>	<p>On information and belief, HopDrive automatically generates the trip request including determining licensing information specific to the driver for the vehicle for the trip. On information and belief, the driver has access to the licensing information specific to the trip available should the driver find him or herself in a situation where it is needed (such as an accident, or inquiry from law enforcement). HopDrive insures its drivers when they are on the road. HopDrive’s insurance “provide[s] coverage for drivers from the time they take possession of a customer’s vehicle.” See <a href="https://hopdrive.com/driver-overview">https://hopdrive.com/driver-overview</a>. HopDrive explains that they “know exactly what the insurance cost will be for each car move.”<a href="https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business">https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business</a></p> <p><b>What HopDrive covers</b></p> <p><b>While the driver app is OFF</b></p> <ul style="list-style-type: none"> <li>◦ Only your personal insurance policy applies.</li> </ul> <p><b>While the driver app is ON</b></p> <div style="border: 2px solid yellow; padding: 10px;"> <ul style="list-style-type: none"> <li>◦ <b>Waiting for a move request</b> - Your personal insurance policy applies.</li> <li>◦ <b>While enroute to the customer's pickup location</b> - Your personal insurance policy applies.</li> <li>◦ <b>While driving the customer's vehicle</b> - This is where the HopDrive insurance policy applies.</li> </ul> </div> <p style="text-align: center;"><a href="https://hopdrive.com/driver-overview?resource=1">https://hopdrive.com/driver-overview?resource=1</a></p> <p>HopDrive insures its drivers when they are on the road. As state laws require vehicles to be licensed, and for a driver to be able to provide licensing information if stopped by law enforcement, on information and belief, the licensing information specific to the trip must be provided by the HopDrive system to the driver.</p>

HopDrive describes how they insure each driver as they drive by the mile.

Insurance was a big issue that Mottas and Newton had to deal with as well. The company is insured through James River Insurance, a Richmond-based insurance provider. Social Auto pays for its insurance by the mile, allowing it to keep its costs down and also to know exactly what the insurance cost will be for each car move, which helps with transparent pricing.

"They were the ones that pioneered gig economy insurance with Uber back in the day, and they just happen to be in my hometown," Mottas said. "They've been able to insure us in the ways we need to be insured for us and our customers."

Gig economy drivers, he said, also like the Social Auto Transport model because they are paid for moving a vehicle but incur any of the costs such as fuel, insurance and vehicle wear and tear typically associated with a gig economy driving job.

<https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business>

✓ How does the insurance work if I'm driving another person's car?

HopDrive insures all of our drivers. We have tiered levels of liability insurance depending on the stage of the delivery, as well as collision coverage for the car. For more information, see our insurance details on the driver overview page.

<https://hopdrive.com/driver-sign-up>





## Insurance

We maintain insurance policies that provide coverage for drivers from the time they take possession of a customer's vehicle.

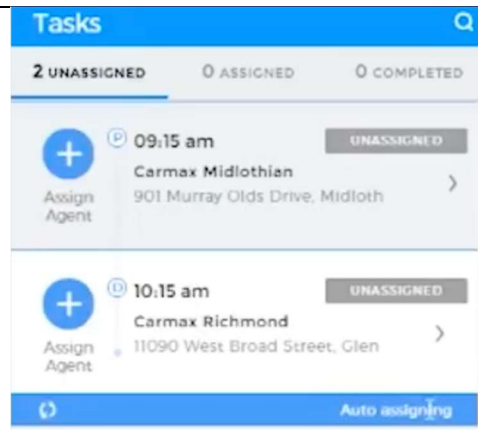
[LEARN MORE](#)

<https://hopdrive.com/driver-overview>

To the extent that HopDrive contends that their method for managing drivers of vehicles does not include “determining licensing information specific to the driver for the vehicle for the trip,” upon information and belief, HopDrive’s method for determining licensing information satisfies these claim elements under the doctrine of equivalents. Upon information and belief, HopDrive ensures that the vehicles it moves are licensed under all applicable state laws while they are transported and ensures that drivers have access to all legally required licensing information in the event the vehicle is stopped. Therefore, HopDrive’s method for managing drivers of vehicles, including determining licensing information specific to the driver, performs substantially the same function, in substantially the same way, to obtain substantially the same result as the “determining licensing information specific to the driver for the vehicle for the trip” claim limitation of Draiver’s method. Accordingly, to the extent there are any differences between HopDrive’s method for determining licensing information specific to the driver for the vehicle for the trip and the claimed method, they are not substantial.

[1(d)] automatically dispatching the driver for the trip,

On information and belief, HopDrive automatically dispatches the driver for the trip. As discussed above, HopDrive’s system has an “auto assigning” functionality that provides one example of how HopDrive’s system will assign drivers to the automatically generated trips. Once the task is assigned to a driver, the assigned driver is notified and can accept or decline the trip. As explained by the HopDrive documentation below, after the driver accepts the trip, they are directed to the vehicle pickup location.



[https://www.youtube.com/watch?v=4KHyavk8Bqs&feature=emb\\_logo](https://www.youtube.com/watch?v=4KHyavk8Bqs&feature=emb_logo)

The screenshot below provides an overview of how the driver interacts with the HopDrive system. This includes the “Accept a Move” step which includes the driver being notified of a vehicle that needs to be moved and agreeing to accept the request.

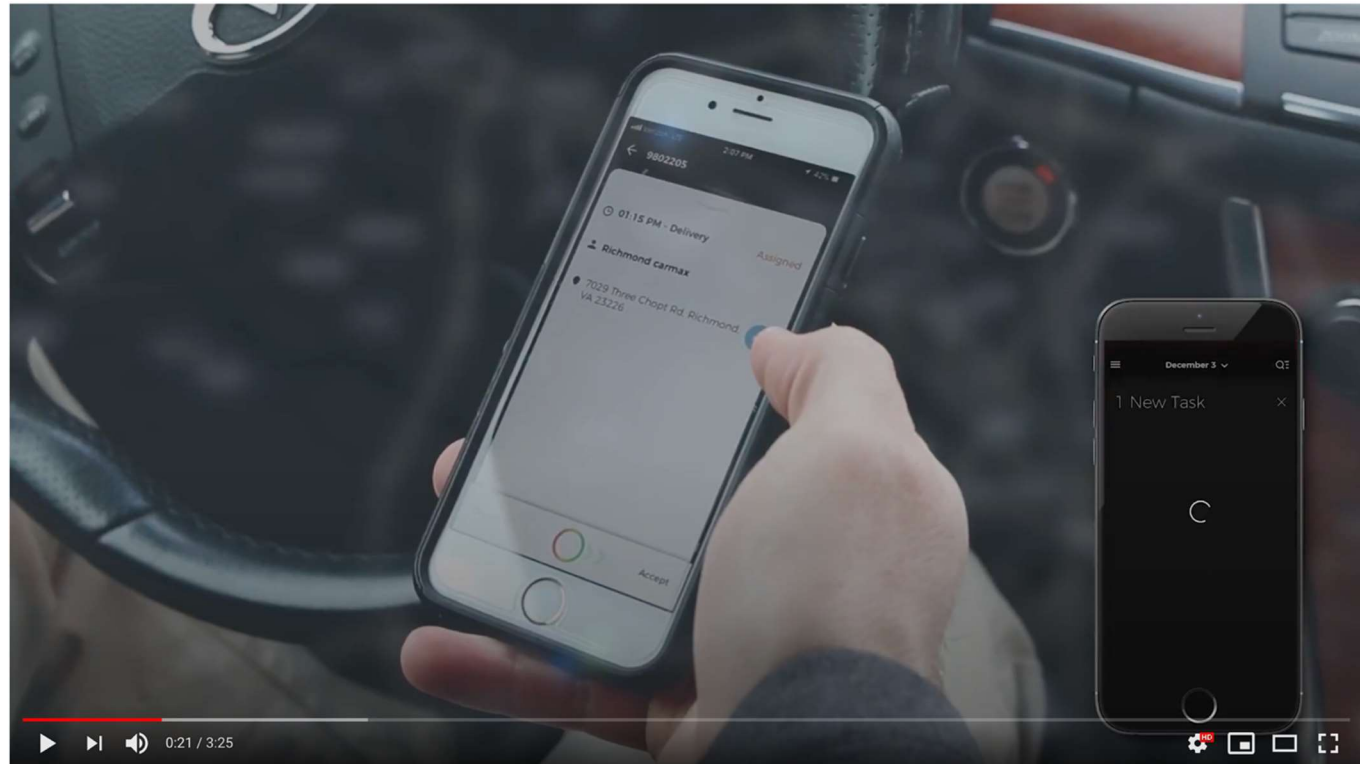


## Accept a Move

Get notified, in real-time, when a vehicle near you needs to be moved. Receive the full details of the move, addresses included. You can make an informed decision to accept or decline without ramifications. Simply mark yourself as started to begin.

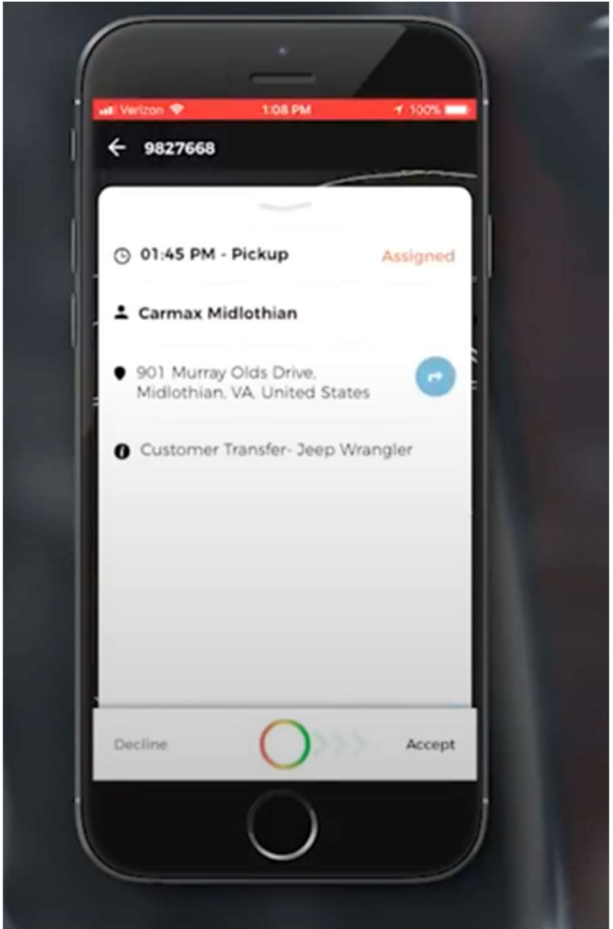
<https://hopdrive.com/driver-overview>

The screenshot and video below displays a HopDrive App automatically dispatching a driver to pick up a vehicle.

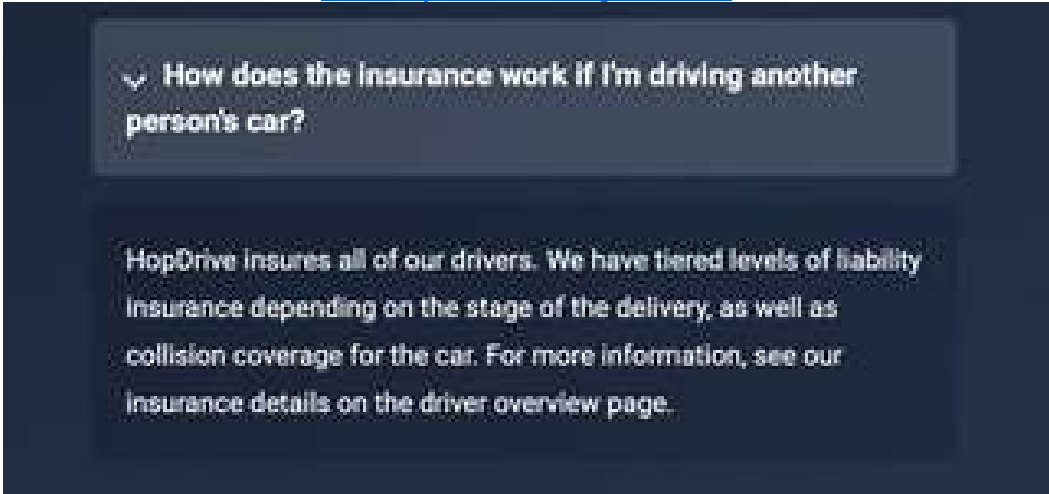


<https://vimeo.com/user177436814>

To the extent that HopDrive contends that their method for managing drivers of vehicles does not “automatically dispatch[] the driver for the trip,” upon information and belief, HopDrive’s method featuring the “Auto assigning” feature satisfies these claim elements under the doctrine of equivalents. On information and belief, the Auto assigning feature automatically assigns unassigned trips to “agents” which is what HopDrive calls its drivers. Therefore, HopDrive’s method for managing drivers of vehicles performs substantially the same function, in substantially the same way, to obtain substantially the same result as the “automatically dispatching the driver for the trip” claim limitation of Draiver’s method. Accordingly, to the extent there are any differences between HopDrive’s method for automatically dispatching the driver for the trip and the claimed method, they are not substantial.

<p>[1(e)] wherein automatically dispatching the driver includes sending, to the driver, the trip request,</p>	<p>On information and belief, HopDrive automatically dispatching the driver including sending, to the driver, the trip request. The HopDrive mobile application displays the details of the trip request once it is received by the driver.</p>  <p><a href="https://www.youtube.com/watch?v=4KHyavk8Bqs&amp;feature=emb_logo">https://www.youtube.com/watch?v=4KHyavk8Bqs&amp;feature=emb_logo</a></p>
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<p>[1(f)] wherein automatically dispatching the driver further includes sending the licensing information specific to the driver to a smartphone of the driver.</p>	<p>On information and belief, HopDrive automatically dispatches the driver including sending the licensing information specific to the driver to a smartphone of the driver. HopDrive insures its drivers when they are on the road. In addition, on information and belief, the licensing information is sent to the driver such that the driver has access to the licensing information specific to the trip available should the driver find him or herself in a situation where it is needed (such as an accident, or inquiry from law enforcement).</p> <p><b>What HopDrive covers</b></p> <p><b>While the driver app is OFF</b></p> <ul style="list-style-type: none"> <li>◦ Only your personal insurance policy applies.</li> </ul> <p><b>While the driver app is ON</b></p> <ul style="list-style-type: none"> <li>◦ <b>Waiting for a move request</b> - Your personal insurance policy applies.</li> <li>◦ <b>While enroute to the customer's pickup location</b> - Your personal insurance policy applies.</li> <li>◦ <b>While driving the customer's vehicle</b> - This is where the HopDrive insurance policy applies.</li> </ul> <p><a href="https://hopdrive.com/driver-overview?resource=1">https://hopdrive.com/driver-overview?resource=1</a></p> <p>Social Auto Transport describes how they insure each driver as they drive by the mile.</p>
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	<p>Insurance was a big issue that Mottas and Newton had to deal with as well. The company is insured through James River Insurance, a Richmond-based insurance provider. Social Auto pays for its insurance by the mile, allowing it to keep its costs down and also to know exactly what the insurance cost will be for each car move, which helps with transparent pricing.</p> <p>"They were the ones that pioneered gig economy insurance with Uber back in the day, and they just happen to be in my hometown," Mottas said. "They've been able to insure us in the ways we need to be insured for us and our customers."</p> <p>Gig economy drivers, he said, also like the Social Auto Transport model because they are paid for moving a vehicle but incur any of the costs such as fuel, insurance and vehicle wear and tear typically associated with a gig economy driving job.</p> <p><a href="https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business">https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business</a></p>  <p><a href="https://hopdrive.com/driver-sign-up">https://hopdrive.com/driver-sign-up</a></p>
[4] The method of claim 1, wherein the licensing	On information and belief, HopDrive's licensing information specific to the driver indicates operating authority for the driver of the vehicle for the trip. As discussed above, with respect to limitation [1(c)], on information and belief, HopDrive licenses its drivers for each trip and determines licensing information on a

information specific to the driver indicates operating authority for the driver of the vehicle for the trip.

trip-by-trip basis. Accordingly, on information and belief, the licensing information would also indicate operating authority for the driver of the vehicle.

## **What HopDrive covers**

### **While the driver app is OFF**

- Only your personal insurance policy applies.

### **While the driver app is ON**

- **Waiting for a move request** - Your personal insurance policy applies.
- **While enroute to the customer's pickup location** - Your personal insurance policy applies.
- **While driving the customer's vehicle** - This is where the HopDrive insurance policy applies.

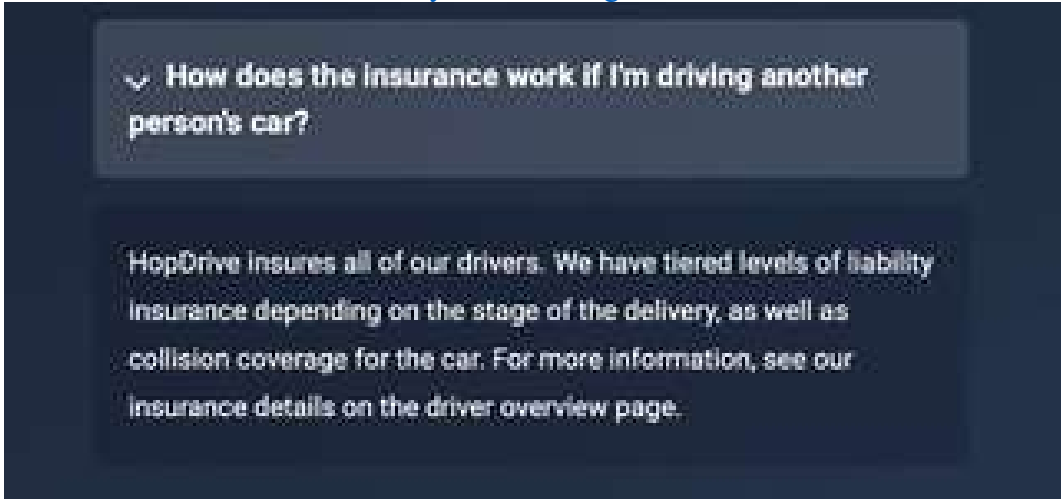
<https://hopdrive.com/driver-overview?resource=1>

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<p>[6] The method of claim 1, automatically dispatching the driver further includes transmitting, to the smartphone of the driver, a task list associated with the trip request.</p>	<p>On information and belief, HopDrive automatically dispatches the driver including transmitting, to the smartphone of the driver, a task list associated with the trip request. The mobile application receives and displays a task list with details of the trip. On information and belief, a task list, which may include as non-limiting examples, pre and post-trip inspection tasks, aftermarket work, or at home test drives, would be transmitted to the smartphone of the driver.</p>



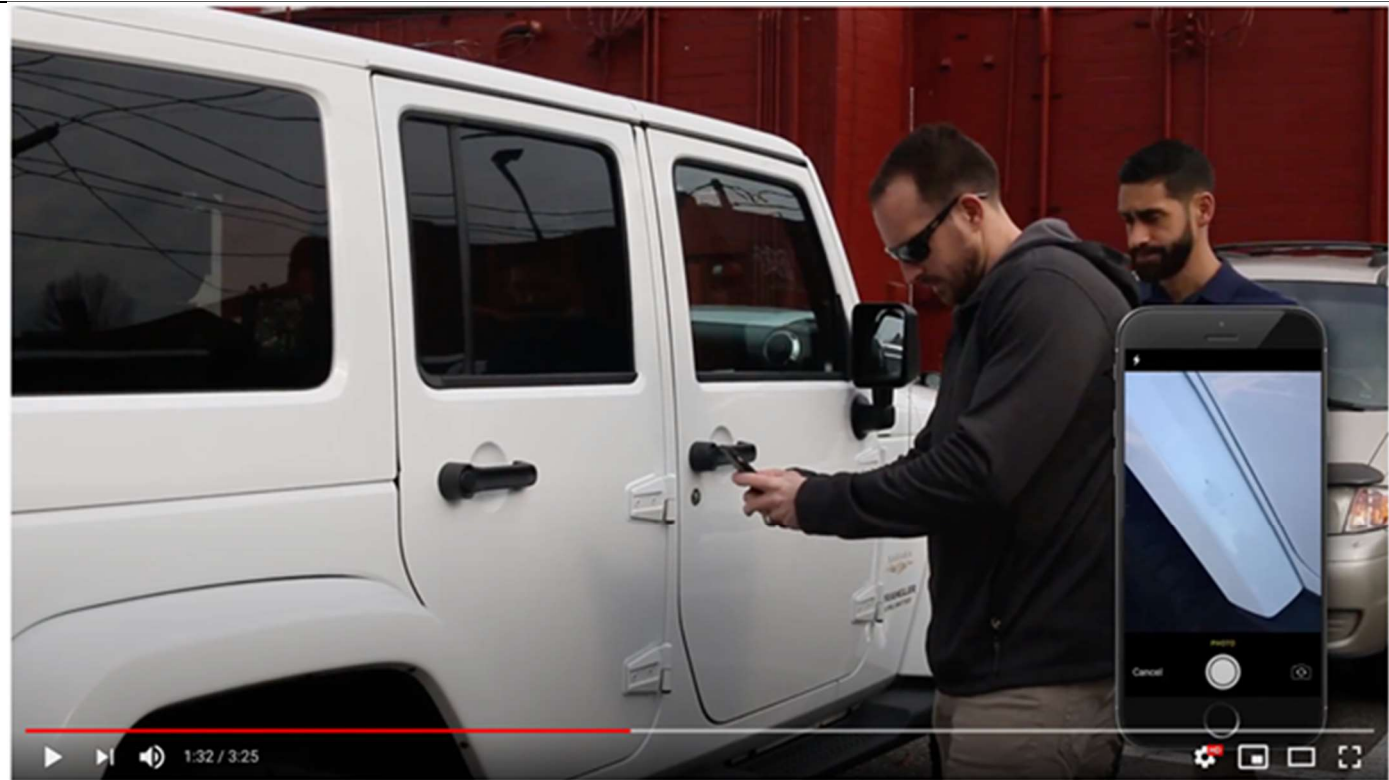


## **Deliver the Vehicle**

Drive someone else's car for a change. Move the customer's car to the requested location. Upon pickup and delivery you will perform a pre and post-trip inspection, capture vehicle information, snap photos, and upload the information to our app.

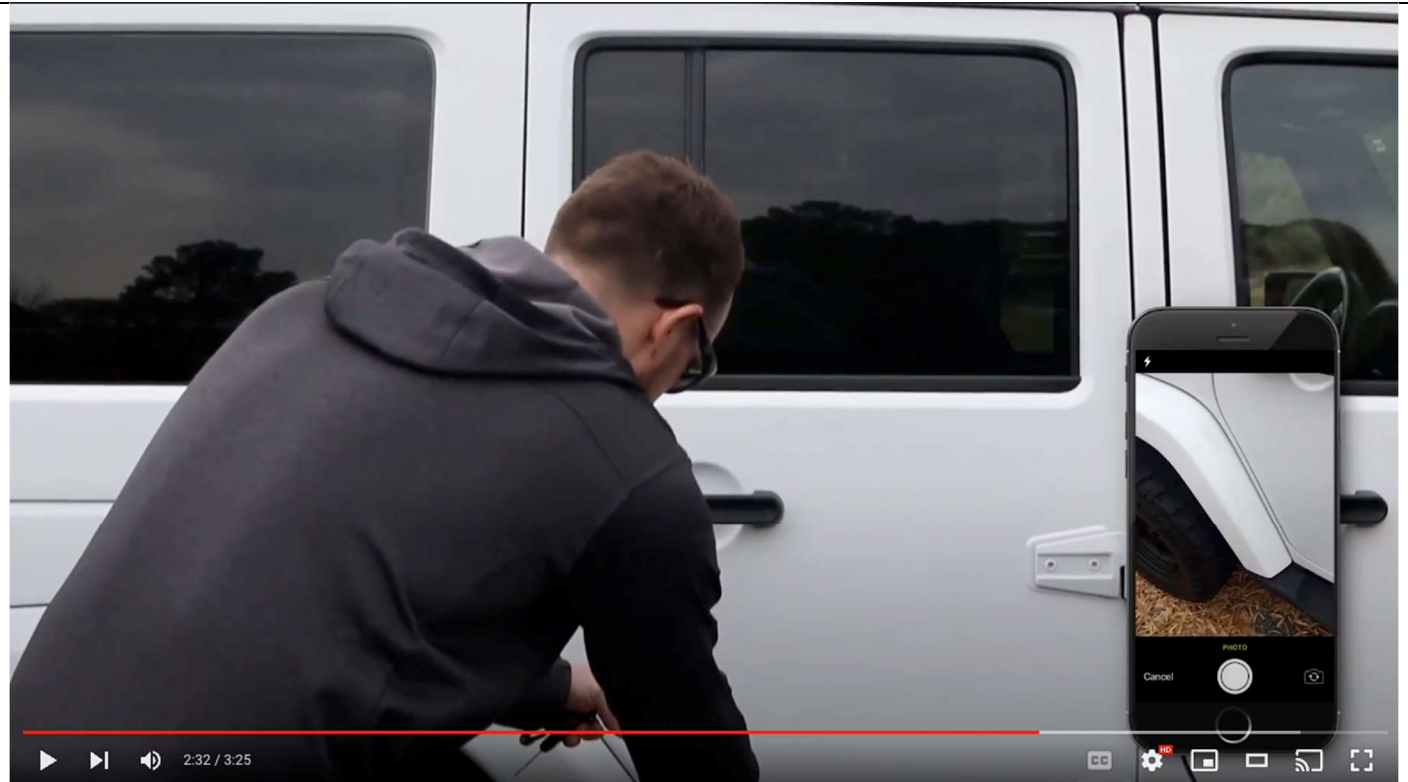
<https://hopdrive.com/driver-overview>

The screenshot below shows the driver taking photos of the vehicle status before picking up the vehicle.



[https://www.youtube.com/watch?v=4Khyavk8Bqs&feature=emb\\_logo](https://www.youtube.com/watch?v=4Khyavk8Bqs&feature=emb_logo)

The screenshot below shows the driver taking photos of the vehicle after delivery.



[https://www.youtube.com/watch?v=4Khyavk8Bqs&feature=emb\\_logo](https://www.youtube.com/watch?v=4Khyavk8Bqs&feature=emb_logo)

# More Ways to Use HopDrive

Here are just some of the ways we drive vehicles...

## For Your Customers

- ✓ Pickup and delivery
- ✓ Loaner drop-offs
- ✓ Retail Deliveries
- ✓ At-home test drives
- ✓ Remote appraisals

## For Your Business

- ✓ Reconditioning
- ✓ Load Balancing
- ✓ Post auction pickup
- ✓ Aftermarket work
- ✓ Same-day moves

[HopDrive | Dealer Overview](#)



**RepairPal.com**

September 29, 2022 · 🌐

Announcing our newest partnership with HopDrive, making customer concierge easier than ever. RepairPal's Certified Network now has the power of making concierge pick up and delivery an integral part of service during maintenance and repairs.

"HopDrive's mission of providing total transparency is a perfect marriage with RepairPal's core values, as customers are always updated on the status of their vehicle. We believe this service will improve overall quality and customer satisfaction within our network of shops and dealers." -Kathleen Long, Chief Revenue Officer at RepairPal

Read the full press release here: <https://bit.ly/3SwqesG>

#automotive #repairpal #HopDrive #partnership #announcement  
#autorepair #automotiverepair #fairrepair #autosshops #autodealers  
#customerservice

**RepairPal and  
HopDrive Partner  
Together to Make  
Customer Concierge  
Easier Than Ever**

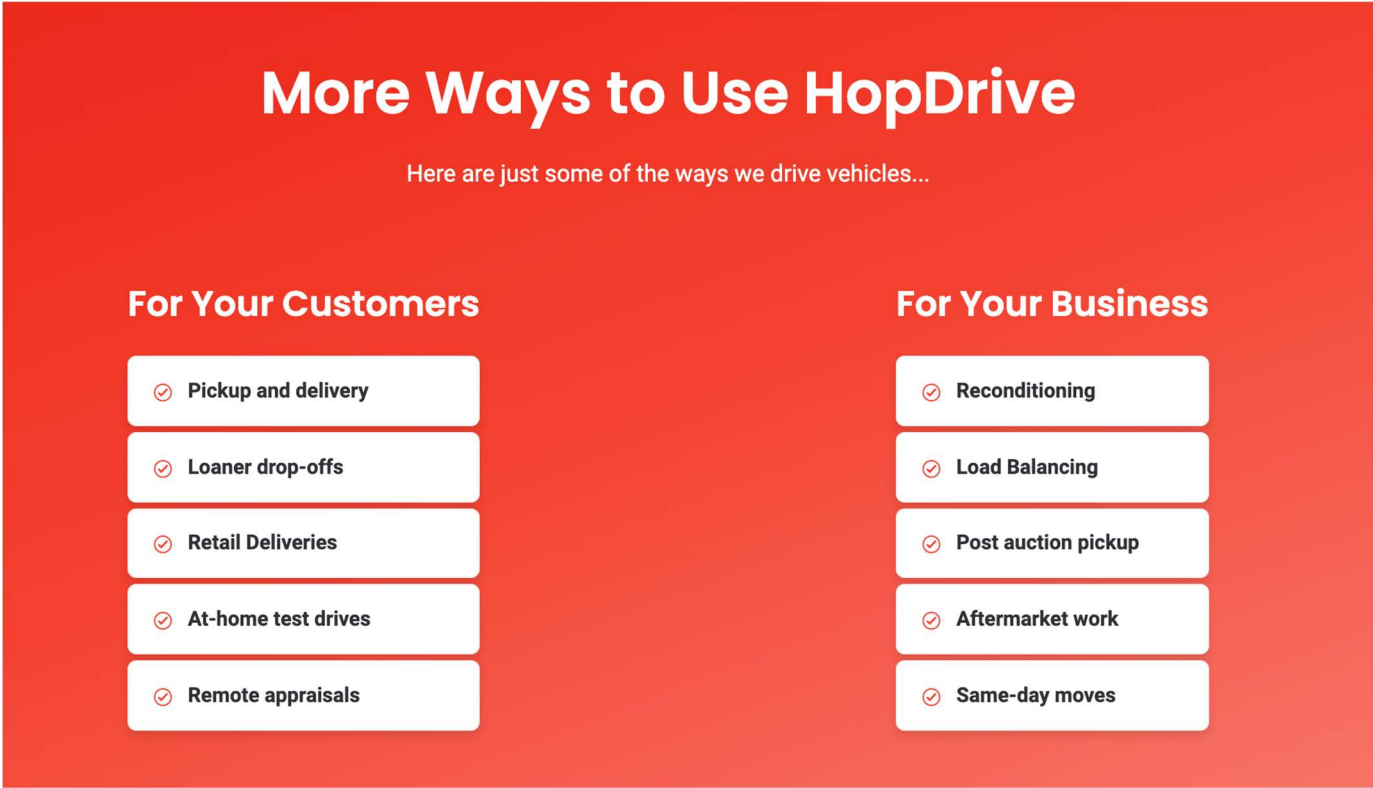





X



NEWS.REPAIRPAL.COM

**RepairPal and HopDrive Partner Together to Make  
Customer Concierge Easier Than Ever**

	<a href="https://news.repairpal.com/208038-repairpal-and-hopdrive-partner-together-to-make-customer-concierge-easier-than-ever?utm_source=PR&amp;utm_medium=Partner&amp;utm_campaign=HopDrive">https://news.repairpal.com/208038-repairpal-and-hopdrive-partner-together-to-make-customer-concierge-easier-than-ever?utm_source=PR&amp;utm_medium=Partner&amp;utm_campaign=HopDrive</a>												
<p>[7] The method of claim 6, wherein the trip request further comprises a route for the vehicle including a pick-up location, at least one location associated with a corresponding task of the task list, and a drop-off location.</p>	<p>On information and belief, HopDrive’s trip request includes a route for the vehicle from a pick-up location to an intermediate task location corresponding to a task of the task list and to a drop-off location.</p> <p>HopDrive promotes the option for scheduling aftermarket work for a car. On information and belief, HopDrive provides a trip request including a pick-up location, a drop-off location, and a task location (e.g., a shop that does aftermarket work) corresponding to a task of the task list.</p>  <p>The screenshot shows a red background with the title "More Ways to Use HopDrive" in white. Below the title is the text "Here are just some of the ways we drive vehicles...". There are two columns of services, each with a heading and a list of items in white boxes with red checkmarks.</p> <table border="1"> <thead> <tr> <th>For Your Customers</th> <th>For Your Business</th> </tr> </thead> <tbody> <tr> <td>✓ Pickup and delivery</td> <td>✓ Reconditioning</td> </tr> <tr> <td>✓ Loaner drop-offs</td> <td>✓ Load Balancing</td> </tr> <tr> <td>✓ Retail Deliveries</td> <td>✓ Post auction pickup</td> </tr> <tr> <td>✓ At-home test drives</td> <td>✓ Aftermarket work</td> </tr> <tr> <td>✓ Remote appraisals</td> <td>✓ Same-day moves</td> </tr> </tbody> </table> <p><a href="#">HopDrive   Dealer Overview</a></p>	For Your Customers	For Your Business	✓ Pickup and delivery	✓ Reconditioning	✓ Loaner drop-offs	✓ Load Balancing	✓ Retail Deliveries	✓ Post auction pickup	✓ At-home test drives	✓ Aftermarket work	✓ Remote appraisals	✓ Same-day moves
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	<p>HopDrive provides a concierge service that will move a car from “driveway to dealership and back”. That is, a request to drive a target vehicle on a trip to a destination location (e.g., driveway) via an intermediate task location (e.g., dealership) and to a drop-off location (e.g., driveway) can be received via HopDrive’s Move Planner interface.</p> <div data-bbox="520 375 1906 678"> <h2>Your customers want concierge.</h2> <p>Impress your customers with a concierge service that takes their car from driveway to dealership and back, with minimal effort.</p> <p><a href="#">HopDrive   Home</a></p> </div>
<p>[8(pre)] One or more non-transitory computer-readable media storing computer-executable instructions that, when executed by a processor, perform a method of managing driving of vehicles, the method comprising the steps of:</p>	<p>On information and belief, HopDrive’s system is implemented on one or more non-transitory computer-readable media storing computer-executable instructions that, when executed by a processor, perform a method of managing driving of vehicles.</p> <div data-bbox="520 943 1906 1317"> <div>  <h3>Accept a Move</h3> <p>Get notified, in real-time, when a vehicle near you needs to be moved. Receive the full details of the move, addresses included. You can make an informed decision to accept or decline without ramifications. Simply mark yourself as started to begin.</p> </div> <div>  <h3>Deliver the Vehicle</h3> <p>Drive someone else's car for a change. Move the customer's car to the requested location. Upon pickup and delivery you will preform a pre and post-trip inspection, capture vehicle information, snap photos, and upload the information to our app.</p> </div> <div>  <h3>Catch a Ride</h3> <p>Catch a ride back to your car, ON US! If we don't have a return trip planned for you to drive to another location, then the HopDrive app will automatically request a ride back for you. By the way, you get paid for the ride back as well! Earn money while you drive AND ride!</p> </div> </div>

<https://hopdrive.com/driver-overview>



## Schedule a HopDrive

Schedule a move in our easy-to-use Dealer Portal. In most cases, our drivers can be on location within 90 minutes. Customers get a visual of the driver, the vehicle, and the step-by-step tracking in real-time.



## HopDrive Arrives

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<https://hopdrive.com/dealer-overview>



hopdrive

(800) 913-7674
(804) 487-3935
Lyft - Atlanta

### Move Planner

Welcome to the move planner. This form allows you to set up a plan to move your vehicles. When the pickup time arrives, one of our drivers will be ready to move your vehicle(s) for you. Be sure to have someone meet our driver at both ends for inspection.

TYPE

One-Way

Round-Trip

Concierge

Concierge + Loaner

LANE

Pickup Location

Delivery Location

SHOW FAVORITE LANES

MOVE

Pickup Location

Reference #

Stock

Make

Year

Pickup Date

Pickup Time

Dealer Contact

Notes/Instructions (0/255)

Special instructions...

AUTOMATIC

MANUAL

VIN

Model

Color

FINISH PLAN

<https://marketplace.fortellis.io/solutions/social-auto-transport-inc/hopdrive?id=3eac4c50-06ee-42dc-b995-2c5159f70974>

[8(a)] receiving a request, submitted by a user, to drive a vehicle on a trip from a first location to a second location;

HopDrive’s system receives a request, submitted by a user, to drive a vehicle on a trip from a first location to a second location. For example, a user (e.g., a dealer using the Move Planner interface in the Dealer Portal) can submit a request to deliver a vehicle from a first location to a second location. The Move Planner allows for a One-Way trip to be scheduled to move a vehicle from a first location to a second location.

**hopdrive**

(800) 913-7674 (804) 487-3935

### Move Planner

Welcome to the move planner. This form allows you to set up a plan to move your vehicles. When the pickup time arrives, one of our drivers will be ready to move your vehicle(s) for you. Be sure to have someone meet our driver at both ends for inspection.

**TYPE**

**One-Way**  
Move a single vehicle to a different lot.

**Round-Trip**  
Swap two vehicles between lots.

**Concierge**  
Retrieve your customer's vehicle and return it to the service lot.

**Concierge + Loaner**  
Assign a loaner vehicle to the customer and retrieve their vehicle for service.

**LANE**

Pickup Location  
Search for a location...

Delivery Location  
Search for a location...

SHOW FAVORITE LANES

**MOVE**

Pickup Location  
Search for a location...

The pickup time allows you to set a time when the vehicle should be picked up. Note that the pickup time is not exact and may differ from 5-10 minutes.

Pickup Date  
07/29/2021

Pickup Time  
02:10 PM

Dealer Contact  
☎ Dealer/service contact info

Notes/Instructions (0/255)  
🗨 Special instructions...

Reference #

Stock

Make

Year

VIN

Model

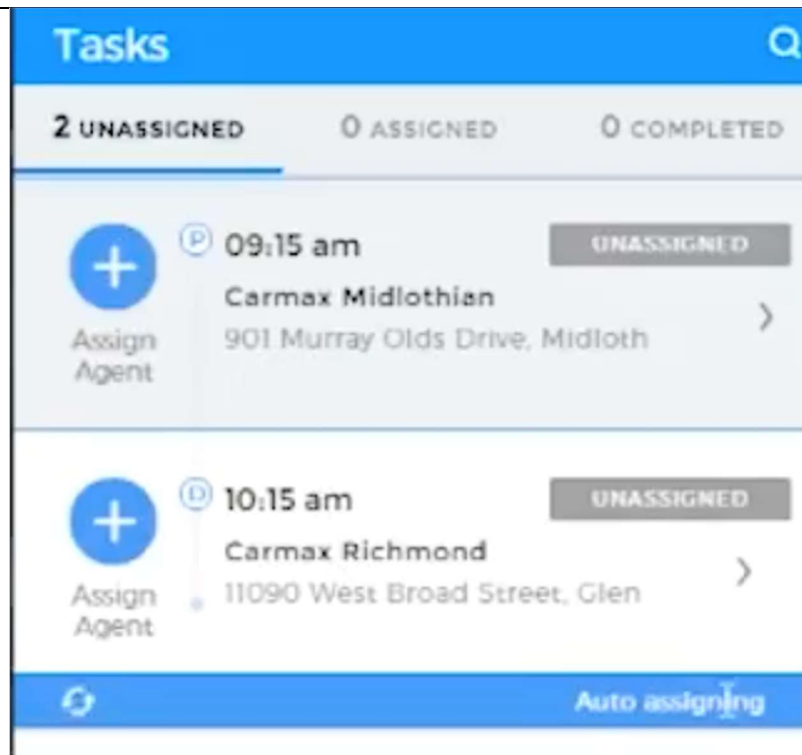
Color

**FINISH PLAN**

<https://marketplace.fortellis.io/solutions/social-auto-transport-inc/hopdrive?id=3eac4c50-06ee-42dc-b995-2c5159f70974>

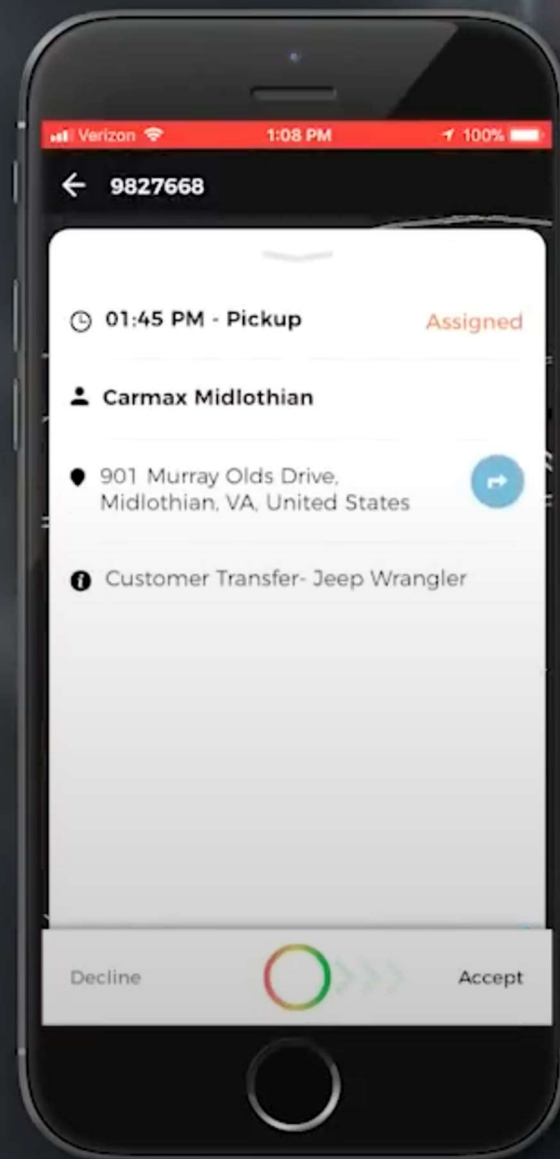
[8(b)] automatically generating a trip request for the trip, said trip request including a driver for the vehicle for the trip;

HopDrive's system automatically generates a trip request for the trip, said trip request including a driver for the vehicle for the trip. In HopDrive's system, a trip request is commonly referred to as a "task." The below image shows that HopDrive's system has an "auto assigning" functionality that provides one example of how HopDrive's system will assign drivers to the automatically generated trips. Once the task is assigned to a driver, the assigned driver is notified and can accept or decline the trip.



<https://youtu.be/4Khyavk8Bqs?t=10>

The below screenshot shows an automatically generated trip displayed on the driver's mobile application. The trip is "assigned" and the driver can accept or decline the trip.



	<p>To the extent that HopDrive contends that their method of managing driving of vehicles featuring “Auto assigning” does not “automatically generat[e] a trip request for the trip, said trip request including a driver for the vehicle for the trip,” upon information and belief, HopDrive’s method featuring the “Auto assigning” feature satisfies these claim elements under the doctrine of equivalents. On information and belief, the Auto assigning feature s <u>automatically assigns unassigned trips to “agents” which is what HopDrive calls its drivers.</u> Therefore, HopDrive’s method of managing driving of vehicles performs substantially the same function, in substantially the same way, to obtain substantially the same result as the “automatically generating a trip request for the trip, said trip request including a driver for the vehicle for the trip” claim limitation of Draiver’s driver assignment method. Accordingly, to the extent there are any differences between HopDrive’s method of automatically generating a trip request for the trip, said trip request including a driver for the vehicle for the trip, and the claimed method, they are not substantial.</p>
[8(c)] wherein automatically generating the trip request includes determining licensing information specific to the owner of the vehicle,	<p>On information and belief, HopDrive automatically generates the trip request including determining licensing information specific to the owner of the vehicle. On information and belief, the driver has access to the licensing information specific to the trip available should the driver find him or herself in a situation where it is needed (such as an accident, or inquiry from law enforcement). HopDrive insures its drivers when they are on the road. HopDrive’s insurance “provide[s] coverage for drivers from the time they take possession of a customer’s vehicle.” See <a href="https://hopdrive.com/driver-overview">https://hopdrive.com/driver-overview</a>. HopDrive explains that they “know exactly what the insurance cost will be for each car move.”<a href="https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business">https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business</a></p> <p><b>What HopDrive covers</b></p> <p><b>While the driver app is OFF</b></p> <ul style="list-style-type: none"> <li>◦ Only your personal insurance policy applies.</li> </ul> <p><b>While the driver app is ON</b></p> <div style="border: 2px solid yellow; padding: 10px;"> <ul style="list-style-type: none"> <li>◦ <b>Waiting for a move request</b> - Your personal insurance policy applies.</li> <li>◦ <b>While enroute to the customer's pickup location</b> - Your personal insurance policy applies.</li> <li>◦ <b>While driving the customer's vehicle</b> - This is where the HopDrive insurance policy applies.</li> </ul> </div>

<https://hopdrive.com/driver-overview?resource=1>

HopDrive describes how they insure each driver as they drive by the mile.

Insurance was a big issue that Mottas and Newton had to deal with as well. The company is insured through James River Insurance, a Richmond-based insurance provider. Social Auto pays for its insurance by the mile, allowing it to keep its costs down and also to know exactly what the insurance cost will be for each car move, which helps with transparent pricing.

"They were the ones that pioneered gig economy insurance with Uber back in the day, and they just happen to be in my hometown," Mottas said. "They've been able to insure us in the ways we need to be insured for us and our customers."

Gig economy drivers, he said, also like the Social Auto Transport model because they are paid for moving a vehicle but incur any of the costs such as fuel, insurance and vehicle wear and tear typically associated with a gig economy driving job.

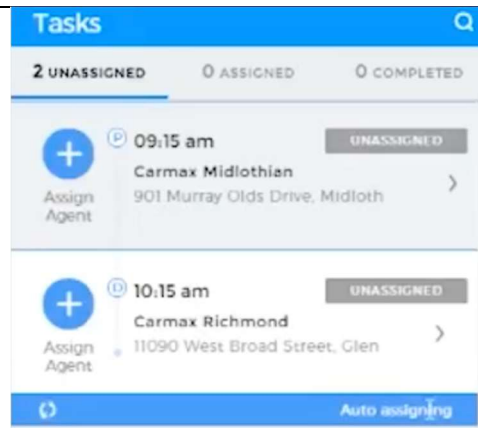
<https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business>

✓ How does the insurance work if I'm driving another person's car?

HopDrive insures all of our drivers. We have tiered levels of liability insurance depending on the stage of the delivery, as well as collision coverage for the car. For more information, see our insurance details on the driver overview page.

<https://hopdrive.com/driver-sign-up>

	<div data-bbox="564 233 659 326"> </div> <div data-bbox="709 235 894 271"> <h2>Insurance</h2> </div> <div data-bbox="709 298 1419 368"> <p>We maintain insurance policies that provide coverage for drivers from the time they take possession of a customer's vehicle.</p> </div> <div data-bbox="716 396 886 451"> <p>LEARN MORE</p> </div> <div data-bbox="966 508 1457 547"> <p><a href="https://hopdrive.com/driver-overview">https://hopdrive.com/driver-overview</a></p> </div> <div data-bbox="516 581 1911 984"> <p>To the extent that HopDrive contends that their method of managing driving of vehicles does not include “determining licensing information specific to the owner of the vehicle,” upon information and belief, HopDrive’s method for determining licensing information satisfies these claim elements under the doctrine of equivalents. Upon information and belief, the HopDrive <u>ensures that the vehicles it moves are licensed under all applicable state laws while they are transported and ensures that drivers have access to all legally required licensing information in the event the vehicle is stopped.</u> Therefore, HopDrive’s method of managing driving of vehicles relating to determining licensing information specific to the owner of the vehicle performs substantially the same function, in substantially the same way, to obtain substantially the same result as the “determining licensing information specific to the owner of the vehicle” claim limitation of Draiver’s method. Accordingly, to the extent there are any differences between HopDrive’s method of determining licensing information and the claimed method, they are not substantial.</p> </div>
<p>[8(d)] automatically dispatching the driver for the trip,</p>	<p>On information and belief, HopDrive automatically dispatches the driver for the trip. As discussed above, HopDrive’s system has an “auto assigning” functionality that provides one example of how HopDrive’s system will assign drivers to the automatically generated trips. Once the task is assigned to a driver, the assigned driver is notified and can accept or decline the trip. As explained by the HopDrive documentation below, after the driver accepts the trip, they are directed to the vehicle pickup location.</p>



[https://www.youtube.com/watch?v=4KHyavk8Bqs&feature=emb\\_logo](https://www.youtube.com/watch?v=4KHyavk8Bqs&feature=emb_logo)

The screenshot below provides an overview of how the driver interacts with the HopDrive system. This includes the “Accept a Move” step which includes the driver being notified of a vehicle that needs to be moved and agreeing to accept the request.



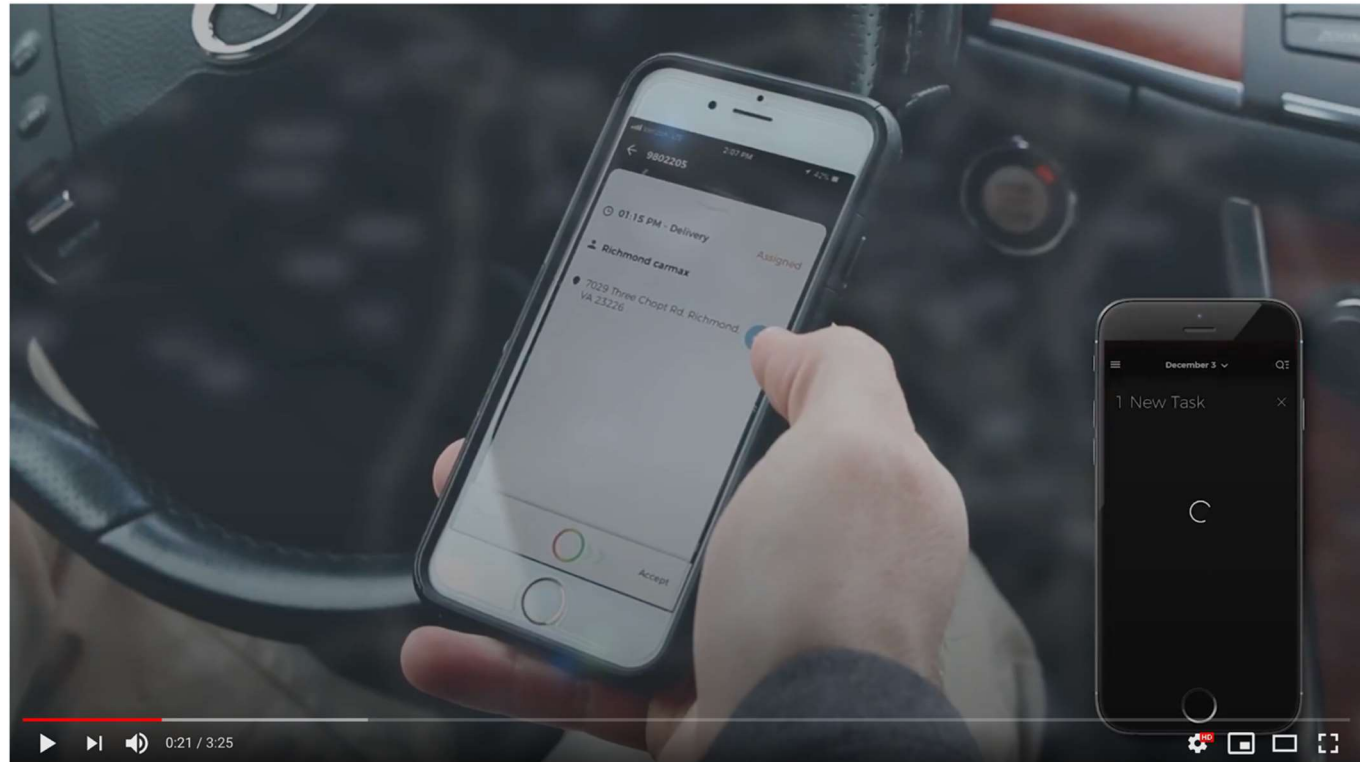
## Accept a Move

Get notified, in real-time, when a vehicle near you needs to be moved. Receive the full details of the move, addresses included. You can make an informed decision to accept or decline without ramifications. Simply mark yourself as started to begin.

<https://hopdrive.com/driver-overview>

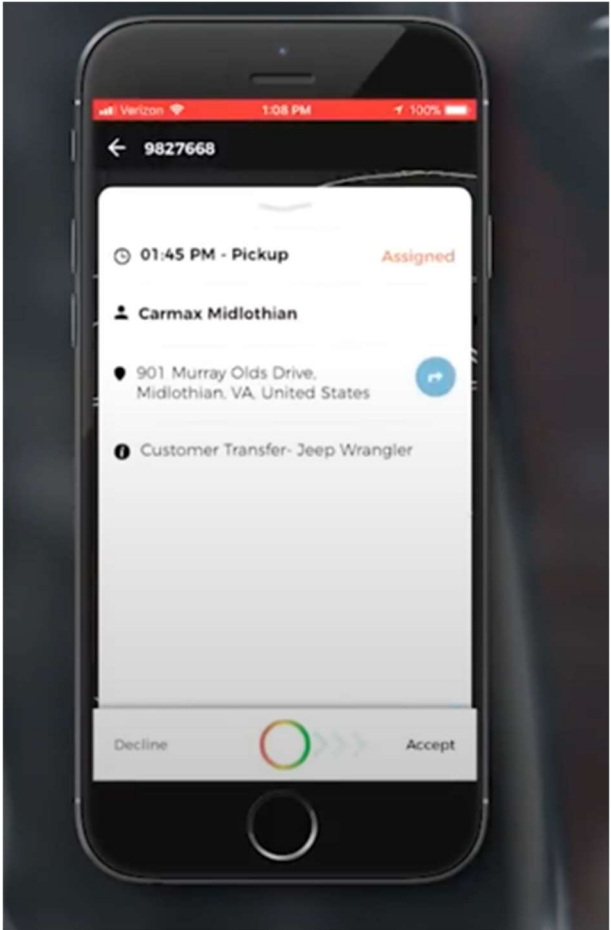


The screenshot and video below displays a HopDrive App automatically dispatching a driver to pick up a vehicle.

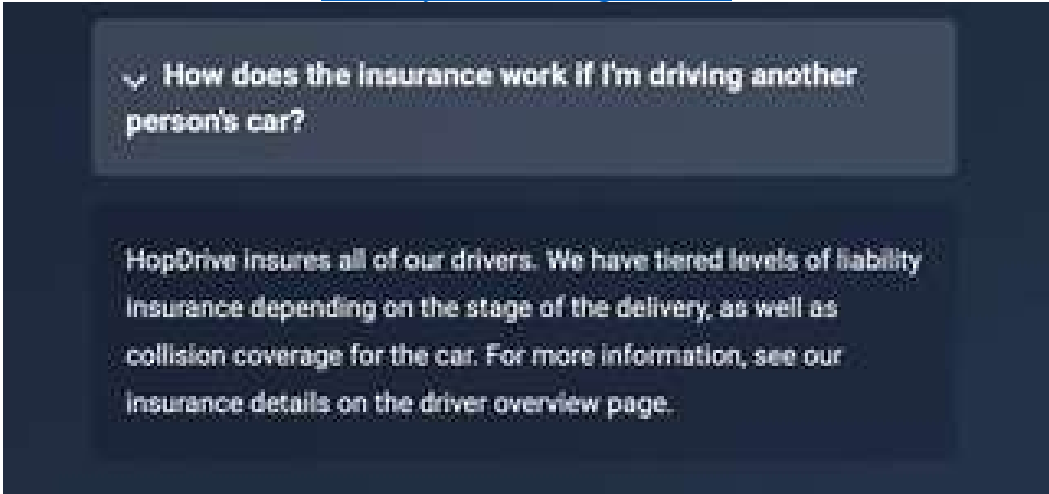


<https://vimeo.com/user177436814>

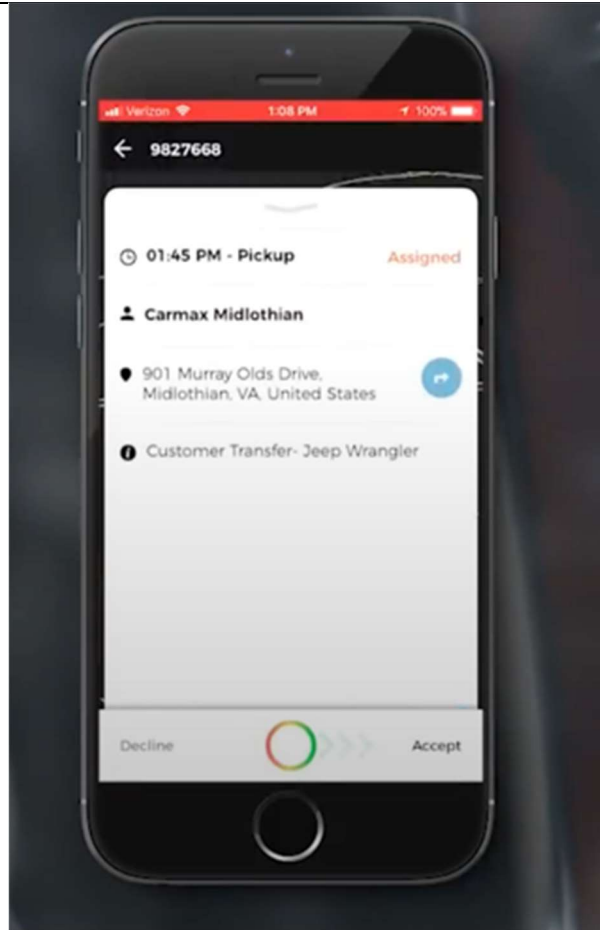
To the extent that HopDrive contends that their method of managing driving of vehicles does not “automatically dispatch[] the driver for the trip,” upon information and belief, HopDrive’s method featuring the “Auto assigning” feature satisfies these claim elements under the doctrine of equivalents. On information and belief, the Auto assigning feature automatically assigns unassigned trips to “agents” which is what HopDrive calls its drivers. Therefore, HopDrive’s automatic method of managing driving of vehicles performs substantially the same function, in substantially the same way, to obtain substantially the same result as the “automatically dispatching the driver for the trip” claim limitation of Draiver’s driver dispatch method. Accordingly, to the extent there are any differences between HopDrive’s automatic driver dispatch method and the claimed method, they are not substantial.

<p>[8(e)] wherein automatically dispatching the driver includes sending, to the driver, the trip request,</p>	<p>On information and belief, HopDrive automatically dispatching the driver including sending, to the driver, the trip request. The HopDrive mobile application displays the details of the trip request once it is received by the driver.</p>  <p><a href="https://www.youtube.com/watch?v=4KHyavk8Bqs&amp;feature=emb_logo">https://www.youtube.com/watch?v=4KHyavk8Bqs&amp;feature=emb_logo</a></p>
<p>[8(f)] wherein automatically</p>	<p>On information and belief, HopDrive automatically dispatches the driver further including sending the licensing information specific to the owner of the vehicle to a smartphone of the driver for the vehicle for the</p>

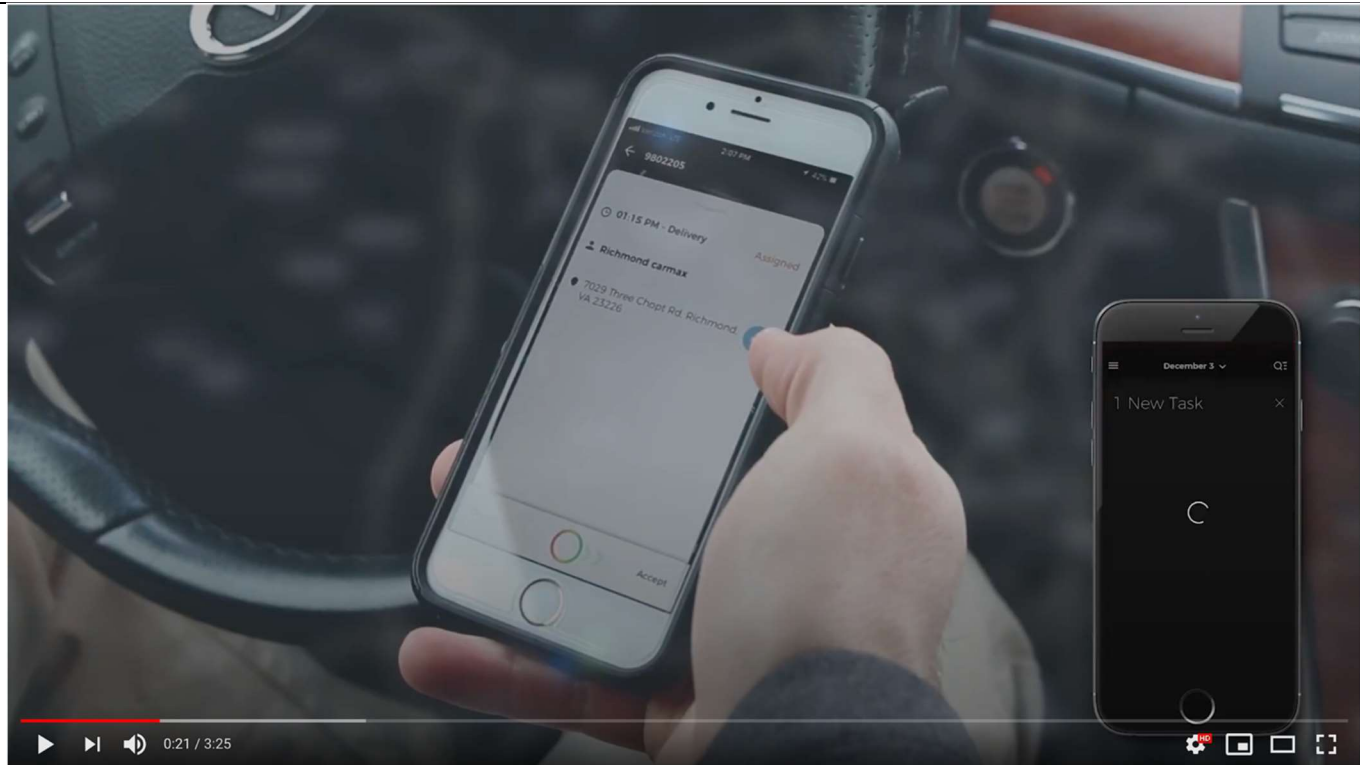
<p>dispatching the driver further includes sending the licensing information specific to the owner of the vehicle to a smartphone of the driver for the vehicle for the trip.</p>	<p>trip. HopDrive insures its drivers when they are on the road. In addition, on information and belief, the licensing information is sent to the driver such that the driver has access to the licensing information specific to the trip available should the driver find him or herself in a situation where it is needed (such as an accident, or inquiry from law enforcement).</p> <p><b>What HopDrive covers</b></p> <p><b>While the driver app is OFF</b></p> <ul style="list-style-type: none"> <li>◦ Only your personal insurance policy applies.</li> </ul> <p><b>While the driver app is ON</b></p> <ul style="list-style-type: none"> <li>◦ <b>Waiting for a move request</b> - Your personal insurance policy applies.</li> <li>◦ <b>While enroute to the customer's pickup location</b> - Your personal insurance policy applies.</li> <li>◦ <b>While driving the customer's vehicle</b> - This is where the HopDrive insurance policy applies.</li> </ul> <p><a href="https://hopdrive.com/driver-overview?resource=1">https://hopdrive.com/driver-overview?resource=1</a></p> <p>Social Auto Transport describes how they insure each driver as they drive by the mile.</p>
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	<p>Insurance was a big issue that Mottas and Newton had to deal with as well. The company is insured through James River Insurance, a Richmond-based insurance provider. Social Auto pays for its insurance by the mile, allowing it to keep its costs down and also to know exactly what the insurance cost will be for each car move, which helps with transparent pricing.</p> <p>"They were the ones that pioneered gig economy insurance with Uber back in the day, and they just happen to be in my hometown," Mottas said. "They've been able to insure us in the ways we need to be insured for us and our customers."</p> <p>Gig economy drivers, he said, also like the Social Auto Transport model because they are paid for moving a vehicle but incur any of the costs such as fuel, insurance and vehicle wear and tear typically associated with a gig economy driving job.</p> <p><a href="https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business">https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business</a></p>  <p><a href="https://hopdrive.com/driver-sign-up">https://hopdrive.com/driver-sign-up</a></p>
[11] The method of claim 8, wherein automatically	On information and belief, HopDrive automatically dispatches the driver further including sending information specific to the trip to the smartphone of the driver for the vehicle for the trip. HopDrive's system displays information about the trip to the driver via a smartphone.

dispatching the driver further includes sending information specific to the trip to the smartphone of the driver for the vehicle for the trip.



[https://www.youtube.com/watch?v=4KHyavk8Bqs&feature=emb\\_logo](https://www.youtube.com/watch?v=4KHyavk8Bqs&feature=emb_logo)



<https://vimeo.com/user177436814>

[12] The method of claim 8, wherein the licensing information specific to the owner of the vehicle indicates operating authority for the vehicle for the trip.

On information and belief, HopDrive's licensing information specific to the owner of the vehicle indicates operating authority for the driver of the vehicle for the trip. On information and belief, the driver has access to the licensing information specific to the trip available should the driver find him or herself in a situation where it is needed (such as an accident, or inquiry from law enforcement). As discussed above, with respect to limitation [1(c)], on information and belief, HopDrive licenses its drivers for each trip and determines licensing information on a trip-by-trip basis. Accordingly, on information and belief, the licensing information would also indicate operating authority for the driver of the vehicle.

## What HopDrive covers

### While the driver app is OFF

- Only your personal insurance policy applies.

### While the driver app is ON

- **Waiting for a move request** - Your personal insurance policy applies.
- **While enroute to the customer's pickup location** - Your personal insurance policy applies.
- **While driving the customer's vehicle** - This is where the HopDrive insurance policy applies.

<https://hopdrive.com/driver-overview?resource=1>

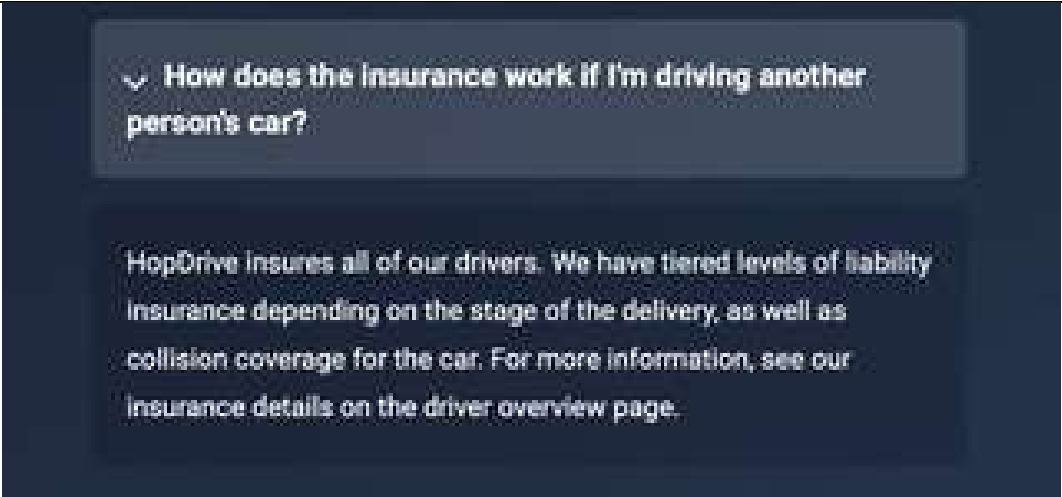
Social Auto Transport describes how they insure each driver as they drive by the mile.

Insurance was a big issue that Mottas and Newton had to deal with as well. The company is insured through James River Insurance, a Richmond-based insurance provider. Social Auto pays for its insurance by the mile, allowing it to keep its costs down and also to know exactly what the insurance cost will be for each car move, which helps with transparent pricing.

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<https://www.freightwaves.com/news/social-auto-transport-raises-15m-in-seed-funding-to-expand-gig-economy-auto-moving-business>

		 <p><a href="https://hopdrive.com/driver-sign-up">https://hopdrive.com/driver-sign-up</a></p>
[13] The method of claim 8, automatically dispatching the driver further includes transmitting, to the smartphone of the driver, a task list associated with the trip request.	See claim 6.	
[14] The method of claim 13, wherein the trip request further comprises a route for the vehicle including a pick-up location, at least one location associated with a corresponding task of	See claim 7.	



the task list, and a drop-off location.	
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